

Torres, Francine

From: arthurharvey@yahoo.com%inter2 [arthurharvey@yahoo.com] on behalf of arthurharvey@yahoo.com
Sent: Friday, February 18, 2005 10:54 PM
To: Torres, Francine
Subject: comment on NOSB apiculture discussion document

.240 includes a definition of "organic raw honey" This would be better if "without adding heat" is placed after "obtained". Also, add "cutting".

(a) includes a transition period of 270 days. This contrasts to a 60-day transition for replacement bees under (i). But the rationale for the time span is the same in both cases. 60 days is adequate because an active hive replaces all its workers within 60 days or less, including gestation.

The final sentence of (a) is confusing where it says "and remove those products...."

(b) it will be impossible to describe everything under (2), or even the majority of them.

(b)(1) the scope of the map, in miles, is not given

(b)(5) drift and robbing can be discouraged, not prevented

(e) & (f) bees cannot be made to choose organic forage when non-organic forage is more attractive to them, for whatever reasons known or unknown. In this circumstance, there is no such thing as "allowing" bees to forage or to "provide bees with forage".

(f)(2) 30 days is too short an interval; it should be 60 days.

(g) a 4 mile radius is too large, and will make organic beekeeping impossible in some states. The normal forage radius of a hive is about 1.25 miles, with a larger or lesser distance according to specific conditions.

(i)(2) the removal of treated wax should be required as in (a).

Arthur Harvey, certified organic beekeeper in Maine